



**HELEN F. DALTON & ASSOCIATES, P.C.**  
ATTORNEYS AT LAW

80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415  
Tel. (718) 263-9591 Fax. (718) 263-9598

September 16, 2022

**Via ECF:**

The Honorable Mary Kay Vyskocil, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St.  
New York, NY 10007-1312

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 9/16/2022

Re: **Cashabamba v. USA Interiors LLC et al**  
Civil Docket No.: 22-cv-03337 (MKV)

Dear Judge Vyskocil:

Our office represents the Plaintiff in the above-referenced matter and we submit this letter motion to respectfully request an adjournment of the parties' Initial Pretrial Conference on September 27, 2022, at 11:30 AM in Courtroom 18C of the Daniel Patrick Moynihan Courthouse, pursuant to the Court's 08/10/2022 Order [Dkt. No. 12]. Defendants' counsel has consented to this request.

Our office will be closed on September 27, 2022 in observance of Rosh Hashanah. As such, we respectfully request that the Court adjourn the parties' Initial Pretrial Conference until a date convenient for the Court in October 2022. The parties have conferred and can propose the following dates: October 12, 2022 and October 13, 2022, should any suit the Court's availability.

This is the first request for an adjournment of the Initial Pretrial Conference and this request would only affect the date by which the parties are to submit the Proposed Case Management Plan and Scheduling Order and joint letter, which are to be provided one week before the conference.

We thank the Court for its consideration on this matter, and we remain available to provide any additional information.

**The request for an adjournment is GRANTED. The Initial Pretrial Conference is rescheduled for Tuesday, October 11 at 12:30 PM in Courtroom 18C of the Daniel Patrick Moynihan Courthouse. In the meantime, the parties should proceed with discovery pursuant to Federal Rule of Civil Procedure 26. SO ORDERED.**

Date: 9/16/2022  
New York, New York

Mary Kay Vyskocil  
United States District Judge

Respectfully submitted,

Roman Avshalumov  
Roman Avshalumov, Esq.